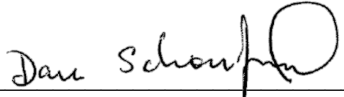# EXHIBIT H

Expert Report of Dan Schonfeld, Ph. D
Regarding Invalidity of U.S. Patent No. 7,946,491

WSOU Investments LLC v. Google LLC
Case No. 20-580 (W.D. Texas)

Date: April 4, 2023

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Dan Schonfeld, Ph. D

POSITA to implement a check to see whether the image processing was complete as part of a determination as to whether processing of the input image was successful.

To the extent, however, that WSOU still contends that Kotlarsky does not disclose or render obvious this limitation, I note that Kotlarsky returns a value indicating successful preprocessing, preprocessing was not performed, or an error occurred during preprocessing, respectively, and this discloses the limitation at least under WSOU's interpretation of the claim as understood from its infringement contentions, which consider the return of a value after performing a correction to constitute a check for completion of the correction. Plaintiff's Amended Final Infringement Contentions at 14 (Apr. 1, 2022) (alleging that the accused functionality "determines whether the processing of the image is successful and proceeds to decoding if the image correction returns a value indicating that the correction was completed. See Exhibit L, §§ II.B-C.")

[1.c] switching to one of a different barcode reading method or processing a new frame of the input image using the current barcode reading method in response to the processing of the input image being unsuccessful;

This limitation is disclosed by Kotlarsky, or at least would have been rendered obvious by Kotlarsky in view of the general knowledge of a POSITA. As discussed in detail in the summary of Attia in Section 7.A.i, a POSITA would understand Kotlarsky to disclose or render obvious performing switching to a standard Image Preprocessing Module from an Image Preprocessing Plugin and/or switching to a standard Image Processing and Barcode Decoding Module from an Image Processing and Barcode Decoding Plugin ("switching to . . . a different barcode reading method") in response to a determination that the Image Prepocessing Plugin including the IMGPREPR Plug-In Function returns a negative value indicating that an error occurred during preprocessing ("the processing of the input image being unsuccessful"). "The system behavior (i.e. features) of the imaging-based bar code symbol reading system of the present invention can be modified by the end-user, within a set of manufacturer-defined constraints"; Kotlarsky calls these modifiable modules "plug-in modules (i.e. libraries) for any modifiable task within the application layer of the system, so as to allow the end user to flexibly modify prespecified features and functionalities of the system." Kotlarsky, 24:33-47.